

Via Electronic Filing

September 7, 2023

Honorable Philip M. Halpern United State District Court Southern District of New York 300 Quarropas Street White Plains, NY 10601

RE: Parkview Station Condo

Insurance Company Docket No.: 7:22-cv-09240 Application granted.

The discovery conference scheduled for 9/11/23 at 11:30 a.m. is adjourned to 9/11/23 at 12:30 p.m. in Courtroom 520 of the White Plains Courthouse. National counsel for Defendant is granted leave to appear telephonically. At the time of the scheduled conference, all parties appearing by telephone shall call the following number: (888) 398-2342; access code 3456831.

SO ORDERED.

Philip M. Halpern

United States District Judge

Dated: White Plains, New York September 8, 2023

Dear Judge Halpern:

We are local counsel to Defendant Farmers Property and Casualty Insurance Company ("Defendant" or "Farmers") in connection with the captioned matter.

An in-person pre-motion conference is scheduled in this case for September 11, 2023 at 11:30 a.m. at the Charles L. Brieant Jr. United States Courthouse, 300 Quarropas Street, White Plains, New York 10601, Courtroom 520. Unfortunately, both Plaintiff's counsel and Defendant's counsel have another conference with Magistrate Judge McCarthy at the same time on a different matter. The parties respectfully request that the Court reschedule the conference for any other time on September 11, 2023 (between 9:00 a.m. and 10:30 a.m. or between 12:30 p.m. and 5:00 p.m.).

Furthermore, Defendant respectfully requests that Joseph J. Aguda, Jr. of Nielsen & Treas, LLC, National Counsel for Farmers, be permitted to participate in the pre-motion conference virtually, either by telephone or by video. Mr. Aguda's office is located in Metairie, Louisiana and he has been admitted *pro hac vice* in the case. As Local Counsel, I will be appearing in person. Plaintiff's counsel has no objection to this request.

Thank you for your consideration of this request.

Respectfully submitted,

Anne Marie Esposito

cc via ECF: Anne Marie Bossa

F: Anne Marie Bossart, Esq. Frank Paul Winston, Esq.

Counsel for Plaintiff

Joseph J. Aguda, Jr., Esq. *Natonal Cousnel for Defendant*